

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

Plaintiff,

vs.

WILLIAM FERGUSON, et al.

Defendants.

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Case No. 19-cr-10081

**DEFENDANT WILLIAM FERGUSON’S MOTION TO
JOIN CODEFENDANTS’ MOTIONS TO DISMISS INDICTMENT**

Defendant William Ferguson respectfully moves to join in full (1) “Donna Heinel’s Motion to Dismiss Indictment Pursuant to Federal Rules of Procedure 12(b)(3)(B)(v),” (2) “Defendant Lisa ‘Niki’ Williams’ Motion to Dismiss Indictment,” and (3) “Jovan Vavic’s Motion to Dismiss the Indictment.”

For the reasons stated therein, the Indictment should be dismissed for failure to state an offense and failure to allege essential facts under Rules 12(b)(3)(B)(iii) and (v), and 7(c)(1), of the Federal Rules of Criminal Procedure.

Dated: October 15, 2019

Respectfully Submitted,

SMYSER KAPLAN & VESELKA, L.L.P.

By: /s/ Alexander M. Wolf
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**ATTORNEYS FOR DEFENDANT
WILLIAM FERGUSON**

LOCAL RULE 7.1(a)(2) CERTIFICATION

I hereby certify that, pursuant to Rule 7.1(a)(2) of the Local Rules of the United States District Court of Massachusetts, counsel for Defendant Ferguson conferred with counsel for the United States on October 15, 2019 regarding this motion, and Assistant United States Attorney Eric Rosen informed us that the United States has no objection to Defendant Ferguson joining the other co-defendants' motions to dismiss.

/s/ Alexander M. Wolf

Alexander M. Wolf

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 15, 2019.

/s/ Alexander M. Wolf

Alexander M. Wolf